

Columbia County Emergency Communications District

Room 112, Courthouse • P.O. Box 998 St. Helens, OR 97051 (503) 397-152

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THE WASHINICATIONS COMMISSION FFFICE LIFTHE SECRETARY

February 5, 1993

Federal Communications Commission 1919 M. Street Suite 222 Washington, D.C. 20554

Comments on Docket 92-235

Commission Members,

We urge your consideration of a delay for implementation of the requirements outlined in Docket 92-235 to at least the year 2004.

Many of Oregon's public safety radio systems will require total replacement under the new requirements. Technology that will be available in the time limits imposed by Docket 92-235 will not meet the requirements of public safety services.

The time frames of Docket 92-235 requirements are unrealistic. Providers of emergency response activation must be given a reasonable period of time to budget for change.

Agencies with overlapping jurisdictions depend on interoperability for their own personal safety as well as efficient delivery of service. The APCO issues statement clearly outlines concerns, not only of interoperability during the changeover period, but longer term concerns of intelligibility, audibility and system stability. In addition, this proposal would render Oregon's statewide law enforcement and fire/hazardous materials radio nets inoperable.

The requirements of Docket 92-235, under the present time frames, raise serious concerns about field unit safety which can not be ignored.

Emergency service providers depend on your action to delay implementation of Docket 92-235. A reasonable application for public safety must be developed, technology must catch up to meet requirements and budget reserves must be built.

Sincerely,

J. Smith Administrator